

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

JORGE FLORES,

Plaintiff,

v.

**CRED X DEBT RECOVERY, LLC;
MICHAEL MURPHY;
and DOE 1-4,**

Defendants.

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) **Civil Action No. 1:15-cv-00315-LJV**
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**PLAINTIFF’S NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT AND
ATTORNEY’S FEES**

PLEASE TAKE NOTICE: Plaintiff JORGE FLORES, pursuant to FRCP 55(b)(2), will move this Court before the Hon. Lawrence J. Villardo, United States District Judge, at the United States Courthouse, 2 Niagara Square, in Buffalo, New York, on a date and at a time to be determined by the Court, for an Order entering default judgment against Defendants CRED X DEBT RECOVERY, LLC and MICHAEL MURPHY (“Defendants”) and to award Plaintiff \$4,165.00 in damages. In support of this Motion, Plaintiff has filed a Memorandum in Support and accompanying exhibits.

PLEASE TAKE FURTHER NOTICE that if Defendants are to do so, they must serve opposition papers within fourteen (14) days or by the return date otherwise set by the Court.

July 5, 2016

s/ Robert Amador
ROBERT AMADOR, ESQ.
Attorney for Plaintiff JORGE FLORES

Centennial Law Offices
9452 Telephone Rd. 156
Ventura, CA. 93004
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R.Amador@centenniallawoffices.com

CERTIFICATE OF SERVICE

I certify that on this date, July 5, 2016, I caused a copy of the foregoing
PLAINTIFF'S NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT AND
ATTORNEY'S FEES to be mailed, First Class U.S. Mail, to the following parties:

CRED X DEBT RECOVERY, LLC
4252 Ridge Lea Rd.
Amherst NY 14226

Michael Murphy
4252 Ridge Lea Rd.
Amherst NY 14226

s/ Robert Amador
ROBERT AMADOR, ESQ.
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